



**JEFFREY M. NELSON**  
Chief Legal Officer

Office of Regulatory Staff  
1401 Main Street  
Suite 900  
Columbia, SC 29201  
(803) 737-0800  
ORS.SC.GOV

October 8, 2019

**VIA ELECTRONIC FILING**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Annual Review of Purchased Gas Adjustment and Gas Purchasing Policies of Dominion Energy South Carolina, Incorporated f/k/a South Carolina Electric & Gas Company  
**Docket No. 2019-5-G**

Dear Ms. Boyd:

Through direct testimony filed in this docket, Dominion Energy South Carolina has requested changes to its General Terms and Conditions for natural gas service ("Tariff"). (*See* Jackson Direct Exs. RMJ-3, -4). This letter is to advise the Commission that the Office of Regulatory Staff believes that these requested changes are beyond the scope of a Purchased Gas Adjustment proceeding ("PGA").

The scope of the annual PGA proceeding established in Order No. 87-898 is "to review the purchased gas adjustments and gas purchasing policies" of the Company. The Commission has not since altered the PGA's well-established scope, and ORS believes that a tariff change should be accomplished through other procedural means available to the Company by law. *See, e.g.*, S.C. Code Ann. §§ 58-5-240, -450. Additionally, DESC's interruptible customers were not provided with notice of the requested Tariff changes. Neither the notices published on the Commission's website nor those sent to DESC's customers mention the requested changes, which were first raised in direct testimony and only after the intervention period had closed.

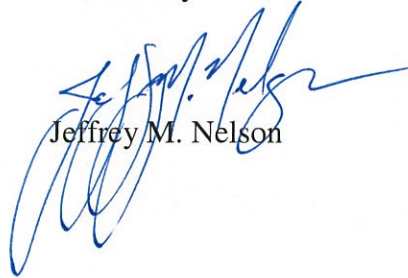
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ORS has advised DESC of these concerns and hopes that the parties can come to a mutually agreeable resolution of this issue. ORS appreciates this opportunity to advise the Commission of its position regarding DESC's requested Tariff changes.

Yours truly,

A handwritten signature in blue ink, appearing to read "Jeffrey M. Nelson", is written over the printed name.

Jeffrey M. Nelson

cc: All Parties of Record (via E-mail)